

O'CONNOR BERMAN DOTTS & BANES
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Attorneys for Plaintiff

**IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

LI FENFEN,

Civ. No. 07-0033

Plaintiff,

VS.

SEAHORSE INC. SAIPAN,

Defendants.

**NOTICE OF TAKING
DEPOSITION PURSUANT
TO RULE 30(b)(6) OF THE
FEDERAL RULES OF
CIVIL PROCEDURE**

TO: Richard W. Pierce, Esq.
Attorney for Defendant

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, on the date and time indicated below, at the Law Office of O'Connor Berman Dotts & Banes, Second Floor, Nauru Building, Susupe, Saipan, or at such other time and place as mutually agreed upon by the parties and witnesses, Plaintiff will take the deposition of the following:

NAME

DATE AND TIME

Designated Representative(s)
Seahorse Inc. Saipan

10:00 a.m.
July 16, 2008

Said deposition is noticed pursuant to Rule 30 (b) (6) of the Federal Rules of Civil Procedure, and said designee(s) of Seahorse Inc. Saipan, shall provide testimony regarding all matters set forth below:

1. The circumstances of the April 29, 2007, jet ski accident in which Plaintiff Li Fenfen was injured.
2. The age, condition, and customary use by Seahorse of the jet ski on which Plaintiff

1 was riding at the time of the accident.

2 3. The circumstances of the hiring and employment of Zhang Hua by Seahorse,
3 including his regular job duties, any steps taken by Seahorse to secure authorization
4 of CNMI Division of Labor for his employment, and any inquiries made into his
5 prior work experience.

6 4. Any education or training with respect to the operation of jet skis undergone by
7 Zhang Hua or other Seahorse employees.

8 5. Any practices or policies of Seahorse relating to the safety of jet ski passengers.

9 6. Any advertising or other representations made by Seahorse to the public with
10 respect to its jet ski services.

11 7. Any other jet ski, boating, or other accidents in which Seahorse personnel have been
12 involved in the course of their employment with Seahorse.

13
14 This deposition shall be upon oral examination before an officer authorized by law to
15 administer oaths. The examination will continue from day to day until completed. You are invited
16 to attend and cross-examine.

17
18 Pursuant to Rule 30(b)(2) of the Federal Rules of Civil Procedure, you are hereby notified
19 that the deposition will be recorded by a cassette tape recorder. Upon completion of the deposition,
20 the tape recording shall be delivered to a secretarial service, which shall transcribe the depositions
21 from the tape recording. The tape recording will be made available to the deponent by the
22 secretarial service in connection with the review and signing of the depositions by the deponent.
23 Upon completion of such review and signing, the tape recording will not be filed with the Court, it
24 will be returned to the undersigned for reuse.

25
26 Dated this 1st day of July, 2004.
27
28

O'CONNOR BERMAN DOTTS & BANES
Attorneys for Plaintiff

_____/s/
By: JOSEPH E. HOREY

3414-01-080707-notice of deposition (seahorse).wpd